

**GREENBERG TRAURIG, LLP**

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Teva Pharmaceutical Industries Ltd.,  
Actavis LLC, and Actavis Pharma, Inc.*

**UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF  
NEW JERSEYCAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

MDL No. 2875

Honorable Robert B.  
Kugler, District Court  
Judge

Honorable Thomas  
Vanaskie (Ret.),  
Special Discovery Master

**NOTICE OF MOTION  
TO SEAL PURSUANT  
TO L. CIV. R. 5.3(g)**

**PLEASE TAKE NOTICE** that on October 15, 2021, or as soon thereafter as counsel may be heard, Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Activas LLC, and Actavis Pharma, Inc. (collectively “Teva”), by and through their counsel in the above-captioned action, shall move before the Honorable Thomas Vanaskie (Ret.), Special Discovery

Master, for entry of an Order redacting portions of the transcript of the hearing before Special Discovery Master Judge Vanaskie dated September 13, 2021 (the “Sept. 13 Transcript”) on Teva’s letter brief in support of challenged confidentiality designations.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Civil Rule 7.1(d)(4), no legal brief is required because all relevant proposed findings of fact and conclusions of law required by Local Rule 5.3(c)(2) have been set forth in the Declaration of Brian H. Rubenstein.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Plaintiffs shall rely upon the accompanying Declaration of Brian H. Rubenstein, counsel for Teva, pursuant to Local Civil Rule 7.1(d)(4); Index in Support of Motion to Redact Transcript; Proposed Findings of Fact and Conclusions of Law; and all papers submitted herewith.

Dated: October 15, 2021

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

By: /s/Brian H. Rubenstein

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 15, 2021, the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

By: */s/Brian H. Rubenstein*  
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